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NEW YORK SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Robert D. Wick

Covington & Burling LLP One CityCenter 850 Tenth Street, NW Washington, DC 20001-4956 T +1 202 662 5487 rwick@cov.com

By Electronic Case Filing

November 15, 2021

Honorable Paul A. Engelmayer United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square, Room 1305 New York, NY 10007

> Re: In re Aluminum Warehousing Antitrust Litigation, No. 13-md-2481; Reynolds Consumer Products LLC v. Glencore AG, No. 16-cv-5955

Dear Judge Engelmayer:

I write on behalf of all Defendants to request an extension of the deadline for the parties to file summary judgment and *Daubert* motions from December 17, 2021 to January 14, 2022, and corresponding extensions of later deadlines related to the briefing schedule for these motions. Plaintiffs Reynolds and Southwire consent to the request.

Defendants seek this extension for the following reasons. First, defense counsel have been heavily occupied with a series of other matters related to this and other cases, including preparing a double-length Brief of Defendants-Appellees (due on November 23) in the pending appeals in the IP and FLP cases. Second, Defendants anticipate filing a single summary judgment motion and a single Daubert motion on behalf of all Defendants, and the additional time will help Defendants coordinate on a single consolidated submission. Third, the additional time would enable Defendants to prepare more concise and cogent papers for the benefit of the Court. Finally, the requested extension will preserve the Thanksgiving holiday for Defendants and their counsel.

For these reasons, Defendants respectfully request that the Court so order the following amendments to the existing schedule:

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Event	Current Deadline	Requested Deadline
Plaintiffs' reply expert reports (with backup data and code)	November 16, 2021	No change
Pre-motion conference letters	November 19, 2021	No change
Response to pre-motion conference letters	November 30, 2021	No change
Expert depositions completed	December 3, 2021	No change
Motions for summary judgment and <i>Daubert</i> motions	December 17, 2021	January 14, 2022
Oppositions	February 14, 2022	March 14, 2022
Replies	March 16, 2022	April 13, 2022
Hearing	As set by the Court	No change

There have been no prior extensions of the summary judgment and Daubert deadline. Plaintiffs consent to this request.

Respectfully submitted,

<u>s/Robert D. Wick</u> Robert D. Wick

Counsel to the JPMorgan defendants

cc: All Counsel-by ECF

Granted. Parties' proposed amended schedule is adopted. The Court wishes the parties a happy Thanksgiving holiday.

SO ORDERED.

PAUL A. ENGELMAYER
United States District Judge
11/15/21